

Judge Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANGEL RODRIGUEZ,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,
LLC,

Defendant,

Case No. 2: 11-CV-00590 RSM

**DECLARATION OF ROBERT E.
SABIDO IN SUPPORT OF
DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
FIRST APPEARANCE**

NOTE FOR MOTION CALENDAR: 7/6/11

I, Robert E. Sabido, hereby declare:

1. I am one of the attorneys representing defendant Portfolio Recovery Associates, LLC ("PRA") in this case.

2. I was just retained to represent PRA. I have not had an opportunity to review the file, and to consider an appropriate first appearance.

3. An extension of the appearance deadline will also allow the parties to explore, if warranted, an early resolution of the case.

4. In an e-mail exchange with PRA, plaintiff's national counsel (Adam Hill) states that he does not object to this request for an extension of time.

5. Accordingly, PRA requests that the court extend the deadline to file its first appearance up to and including August 5, 2011.

6. This motion is made in good faith and not for any improper purpose.

1 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
2 TRUE AND CORRECT.

3 DATED: July 6, 2011
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5 /s/ Robert E. Sabido
6 Robert E. Sabido
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CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2011, I electronically filed the foregoing
**DECLARATION OF ROBERT E. SABIDO IN SUPPORT OF DEFENDANT'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE FIRST APPEARANCE**
with the Clerk of the Court using the CM/ECF System which will send notification of
such filing to the following:

Sharon Cousineau
Cousineau Law Group, LLC
700 West Evergreen Boulevard
Vancouver, WA 98660
Of Attorneys for Plaintiff

DATED: July 6, 2011

/s/ Robert E. Sabido
Robert E. Sabido